

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Jesse Ventura,
a/k/a James G. Janos,

Civil No. 12-0472 (RHK/JJK)

Plaintiff,

v.

Taya Kyle, Executrix of the
Estate of Chris Kyle,

Defendant.

PLAINTIFF JESSE VENTURA'S EXHIBIT AND WITNESS LIST

PRESIDING JUDGE Richard H. Kyle	PLAINTIFF'S ATTORNEY	DEFENDANT'S ATTORNEY
TRIAL DATE(S) Commencing June 30, 2014	COURT REPORTER	COURTROOM DEPUTY

Plaintiff Jesse Ventura ("Ventura") submits the following Witness and Exhibit List.

WITNESSES

Ventura may call any or all of the following witnesses:

1. JESSE VENTURA. Ventura is the Plaintiff in this action. He will testify generally about his military and professional background and the events that took place during the weekend of October 12, 2006. Ventura will testify in particular that the incident described in the *Scruff Face* subchapter of *American Sniper* did not occur and that Chris Kyle fabricated the story. He will further testify that the false and defamatory

story, and Kyle's comments about it in media interviews to promote the book, have caused serious and lasting damage to his reputation, have caused him to suffer great humiliation and embarrassment, and have caused him economic harm.

2. TERRY VENTURA. Ms. Ventura is Jesse Ventura's wife. She will testify that when Ventura returned home from California on October 14, 2006, he did not have any black eyes, did not have any facial bruising or other injuries, and did not otherwise appear to have been punched in the face. She will further testify that Ventura has never during all of the time she has known him ever made any comments to the effect that any American servicemen, especially including Navy SEALs, deserve to die; and, to the contrary, that he holds those who serve our country in the highest regard. Ms. Ventura will also testify that the false and defamatory story, and Kyle's comments about it in media interviews to promote the book, have caused Ventura to suffer great humiliation and embarrassment.

3. TYREL VENTURA. Mr. Ventura is Jesse Ventura's adult son. He will testify that Ventura has never during all of the time he has known him ever made any comments to the effect that any American servicemen, especially including Navy SEALs, deserve to die; and, to the contrary, that he holds those who serve our country in the highest regard. Mr. Ventura will also testify that the false and defamatory story, and Kyle's comments about it in media interviews to promote the book, have caused Ventura to suffer great humiliation and embarrassment.

4. BILL DEWITT. Mr. DeWitt is a corporate security director in the private sector who has served as a Navy SEAL, Army Ranger, Green Beret and, for 23 years, as

an Army counter-intelligence officer. He will testify generally about his background, his relationship with Ventura and the events that took place during the weekend of October 12, 2006. Mr. DeWitt will testify in particular that the incident described in the *Scruff Face* subchapter of *American Sniper* did not occur and that Chris Kyle fabricated the story. He will further testify that Ventura has never during all of the time he has known him ever made any comments to the effect that any American servicemen, especially including Navy SEALs, deserve to die; and, to the contrary, that he holds those who serve our country in the highest regard. Mr. DeWitt will also testify that the false and defamatory story, and Kyle's comments about it in media interviews to promote the book, have caused serious and lasting damage to Ventura's reputation.

5. CHARLENE DEWITT. Ms. DeWitt is Bill DeWitt's wife. She will testify generally about the events that took place during the weekend of October 12, 2006. Ms. DeWitt will testify in particular that the incident described in the *Scruff Face* subchapter of *American Sniper* did not occur and that Chris Kyle fabricated the story.

6. ROBERT LEONARD. Mr. Leonard is a former Navy SEAL. He will testify generally about his background, his relationship with Ventura and the events that took place during the weekend of October 12, 2006. Mr. Leonard will testify in particular that the incident described in the *Scruff Face* subchapter of *American Sniper* did not occur and that Chris Kyle fabricated the story. He will further testify that Ventura has never during all of the time he has known him ever made any comments to the effect that any American servicemen, especially including Navy SEALs, deserve to die; and, to the contrary, that he holds those who serve our country in the highest regard. Mr.

Leonard will also testify that the false and defamatory story, and Kyle's comments about it in media interviews to promote the book, have caused serious and lasting damage to Ventura's reputation.

7. WAYNE ROBERTSON. Mr. Robertson is a former Navy SEAL. He will testify generally about his background, his relationship with Ventura and the events that took place during the weekend of October 12, 2006. He will testify in particular that his observations throughout the weekend caused him to believe that the incident described in the *Scruff Face* subchapter of *American Sniper* did not occur and that Chris Kyle fabricated the story. He will further testify that Ventura has never during all of the time he has known him ever made any comments to the effect that any American servicemen, especially including Navy SEALs, deserve to die; and, to the contrary, that he holds those who serve our country in the highest regard. Mr. Robertson will also testify that the false and defamatory story, and Kyle's comments about it in media interviews to promote the book, have caused serious and lasting damage to Ventura's reputation.

8. CHRIS KYLE deceased (by video deposition). Mr. Kyle was the original Defendant in this action and he wrote *American Sniper*. He will testify about the events that took place during the weekend of October 12, 2006, and his written and oral descriptions and reports of those events. Mr. Kyle will further testify about writing the book, its publication and promotion and all revenues derived from exploitation of the book's false and defamatory story about Ventura.

9. TAYA KYLE (live or by video deposition). Ms. Kyle is Chris Kyle's wife, Executrix of his Estate, and the substituted Defendant in this action. She will testify

generally about her participation in writing the book, its publication and promotion and all revenues derived from exploitation of the book's false and defamatory story about Ventura. She will also testify about Chris Kyle's reputation for honesty, and comments she has made and has permitted to be made in the regional and national media and on the Internet concerning Ventura that were intended to and did further harm his reputation.

10. GUY BUDINSCAK (live or by video deposition). Mr. Budinscak is a former Navy SEAL who served with Chris Kyle. He will testify about the events that took place during the weekend of October 12, 2006. Mr. Budinscak will testify specifically that he was at MCP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle, never saw Chris Kyle punch Ventura, and never saw Ventura on the ground. He will also testify about the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

11. JAMES DEFELICE (live or by video deposition). Mr. DeFelice is the co-author of *American Sniper*. He will testify about his recorded interviews with Chris Kyle and others, writing the book and its publication and promotion.

12. LAURA DESHAZO (live or by video deposition). Ms. deShazo is a defense witness who was never timely disclosed and, for that reason, Ventura has moved *in limine* to exclude her testimony at trial or, alternatively, for leave to take her deposition before trial. In the event the court denies Ventura's motion, and Ms. deShazo is permitted to testify, he reserves the right to call her as part of his case in chief.

13. ROSEMARY DESHAZO (live or by video deposition). Ms. deShazo is a defense witness who was never timely disclosed and, for that reason, Ventura has moved *in limine* to exclude her testimony at trial or, alternatively, for leave to take her deposition before trial. In the event the court denies Ventura's motion, and Ms. deShazo is permitted to testify, he reserves the right to call her as part of his case in chief.

14. JEREMIAH DINNELL (live or by video deposition). Mr. Dinnell is a Navy SEAL who served with Chris Kyle. He will testify about the events that took place during the weekend of October 12, 2006. Mr. Dinnell will specifically testify that he was at McP's bar and restaurant on October 12, 2006, and although he claims to be the only one to have heard one of the statements attributed to Ventura by Chris Kyle, and the only one who claims to have seen Chris Kyle punch Ventura, he will testify to a version of the events that is contrary to the story told by Chris Kyle. He will also testify about the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

15. BOB GASCOFF (live or by video deposition). Mr. Gassoff is a former Navy SEAL who served with Chris Kyle. He will testify about the events that took place during the weekend of October 12, 2006. Mr. Gassoff will specifically testify that he was at McP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle, never saw Chris Kyle punch Ventura, and never saw Ventura on the ground. He will also testify about the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

16. DEBBIE JOB (live or by video deposition). Ms. Job is the mother of a deceased former Navy SEAL who served with Chris Kyle. She will testify about the events that took place during the weekend of October 12, 2006. Ms. Job will specifically testify that she was at McP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle, never saw Chris Kyle punch Ventura, and never saw Ventura on the ground. She did, however, witness an altercation down the street that did not involve Ventura. She will also testify about the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

17. JOHN JONES (live or by video deposition). Mr. Jones is a former Navy SEAL who served with Chris Kyle. He will testify about the events that took place during the weekend of October 12, 2006. Mr. Jones will testify specifically that he was at McP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle, never saw Chris Kyle punch Ventura, and never saw Ventura on the ground. He will also testify about the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

18. JOHN KELLY (live or by video deposition). Mr. Kelly is a former Navy SEAL who served with Chris Kyle. He will testify about the events that took place during the weekend of October 12, 2006. Mr. Kelly will testify specifically that he was at McP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle and never saw Chris Kyle punch Ventura. He

will also testify about how Chris Kyle started the Ventura story at Danny's bar and the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

19. IVAN KRUSIC (live or by video deposition). Mr. Krusic is a former Navy SEAL. He will testify generally about the relatively innocuous Ventura story that made the rounds in the SEAL community before *American Sniper* was published, and how the statements published in *American Sniper* are different in detail and degree and have damaged Ventura's reputation in the SEAL community.

20. KEVIN LACZ (live or by video deposition). Mr. Lacz is a former Navy SEAL who served with Chris Kyle. He will testify about the events that took place during the weekend of October 12, 2006. Mr. Lacz will testify specifically that he was at McP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle, never saw Chris Kyle punch Ventura, and never saw Ventura on the ground. He will also testify about the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

21. DEBBIE LEE (live or by video deposition). Ms. Lee the mother of a deceased former Navy SEAL who served with Chris Kyle. She will testify about the events that took place during the weekend of October 12, 2006. Ms. Lee will specifically testify that she was at McP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle, never saw Chris Kyle punch Ventura, and never saw Ventura on the ground. She will also testify about the

damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

22. **SCOTT MCEWEN** (live or by video deposition). Mr. McEwen is an attorney who is also credited as a co-author of *American Sniper*. He will testify about his interviews with Chris Kyle and others, writing the book and its publication and promotion.

23. **ANDREW PAUL** (live or by video deposition). Mr. Paul is a former Navy SEAL who served with Chris Kyle. He will testify about the events that took place during the weekend of October 12, 2006. Mr. Paul will testify specifically that he was at MCP's bar and restaurant on October 12, 2006, but never heard Ventura make the statements attributed to him by Chris Kyle, never saw Chris Kyle punch Ventura, and never saw Ventura on the ground. He will also testify about a version of events that is contrary to the story told by Chris Kyle, and the damage to Ventura's reputation in the SEAL community that resulted from the story Chris Kyle told in *American Sniper* and to the media.

24. Ventura reserves the right to call any witnesses listed by the Defendant.

25. Ventura reserves the right to call any person identified in any discovery responses by any party to this action.

26. Ventura reserves the right to call such witnesses as may be necessary to lay foundation for any of his exhibits.

27. Ventura reserves the right to call such witnesses as may be necessary for rebuttal.

28. Ventura reserves the right to amend this Witness List at any time prior to trial.

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EXHIBITS

Ventura may introduce any and or all of the following Exhibits into evidence:

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 1				Declaration of Bob Gassoff
Pltf. 2				Memorial Program from Monsoor Funeral
Pltf. 3				Photographs of McP's Bar and Grill in Coronado, CA
Pltf. 4				March 29, 2012 Transcription of Text Messages
Pltf. 5				September 10, 2012 Subpoena issued by Henson & Efron, P.A., to Bob Gassoff
Pltf. 6				Photograph of McP's
Pltf. 7				Photograph of McP's
Pltf. 8				Photograph of McP's
Pltf. 9				Photograph of McP's
Pltf. 10				Photograph of McP's
Pltf. 11				Photograph of McP's
Pltf. 12				Photograph of McP's
Pltf. 13				Declaration of Ivan Krusic
Pltf. 14				Declaration of Andrew Paul
Pltf. 15				Photographs and Aerial Maps of McP's
Pltf. 16				Declaration of Jeremiah Dinnell
Pltf. 17				Photographs and Aerial Maps of McP's

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 18				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 19				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 20				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 21				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 22				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 23				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 24				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 25				Photograph from Jeremiah Dinnell's Facebook Page
Pltf. 26				Declaration of Debbie Lee
Pltf. 27				Photographs and Aerial Maps of MCP's
Pltf. 28				Declaration of Debbie Job
Pltf. 29				Photographs and Aerial Maps of MCP's
Pltf. 30				September 10, 2012 Subpoena issued by Henson & Efron, P.A., to Debbie Job
Pltf. 31				Declaration of Kevin Lacz
Pltf. 32				Photographs and Aerial Maps of MCP's
Pltf. 33				October 9, 2012 Subpoena issued by Henson & Efron, P.A., to Kevin Lacz

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 34				Declaration of John Kelly
Pltf. 35				Photographs and Aerial Maps of McP's
Pltf. 36				September 10, 2012 Plaintiff's Notice of Subpoena for Testimony of John Kelly and Subpoena issued by Henson & Efron, P.A., to John Kelly
Pltf. 37				Photographs and Aerial Maps of McP's
Pltf. 38				September 10, 2012 Plaintiff's Notice of Subpoena for Testimony of John Jones and Subpoena issued by Henson & Efron, P.A., to John Jones
Pltf. 39				October 6, 2006 Schedule of Events for BUD/S Class 58 Reunion
Pltf. 40				Plaintiff's Objections and Second Supplemental Responses to Defendant's Interrogatories and Requests for Production of Documents
Pltf. 41				National Car Rental Receipt, dated October 12, 2006 through October 15, 2006
Pltf. 42				Photographs and Aerial Maps of McP's
Pltf. 43				Reserved
Pltf. 44				Reserved
Pltf. 45				Reserved
Pltf. 46				Cover Pages from Book titled "I Ain't Got Time to Bleed"
Pltf. 47				Cover Pages from Book titled "Do I Stand Alone?"

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 48				Cover Pages from Book titled "Don't Start the Revolution Without Me!"
Pltf. 49				Reserved
Pltf. 50				Reserved
Pltf. 51				Reserved
Pltf. 52				Reserved
Pltf. 53				Reserved
Pltf. 54				Reserved
Pltf. 55				Reserved
Pltf. 56				Reserved
Pltf. 57				Reserved
Pltf. 58				Reserved
Pltf. 59				Reserved
Pltf. 60				Reserved
Pltf. 61				Reserved
Pltf. 62				Reserved
Pltf. 63				Reserved
Pltf. 64				Reserved
Pltf. 65				Reserved
Pltf. 66				Reserved
Pltf. 67				Reserved
Pltf. 68				Reserved

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 69				Copy of pages 310-312 from book titled American Sniper
Pltf. 70				Reserved
Pltf. 71				Reserved
Pltf. 72				Reserved
Pltf. 73				Reserved
Pltf. 74				Reserved
Pltf. 75				Reserved
Pltf. 76				Reserved
Pltf. 77				Reserved
Pltf. 78				Reserved
Pltf. 79				Reserved
Pltf. 80				October 27, 2006 Visa Credit Card Statement
Pltf. 81				Aerial Map of McP's
Pltf. 82				December 20, 2010 HarperCollins Publishers Agreement
Pltf. 83				February 17, 2011 Agreement to Prepare Manuscript between Chris Kyle and Scott McEwen
Pltf. 84				May 22, 2012 Agreement between Chris Kyle and Scott McEwen
Pltf. 85				September 27, 2012 Letter of Direction from Chris Kyle for WME Entertainment, Attn: Tom McGuire, Esq.

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 86				October 5, 2012 HarperCollins Publishers Amendment to December 20, 2010 Agreement
Pltf. 87				October 14, 2011 Email from Scott McEwen to Chris Kyle and James DeFelice, forwarding message from Dave Riedel
Pltf. 88				Transcription of Video Labeled JDF0090 (James DeFelice Interview of Chris Kyle)
Pltf. 89				Transcription of Video Labeled JDF0091 (James DeFelice Interview of Kevin Lacz)
Pltf. 90				First Typewritten Version of the Story about Governor Ventura
Pltf. 91				First Iteration of “Punching Out Jesse”
Pltf. 92				Iteration of “Punching Out Jesse”
Pltf. 93				Iteration of “Punching Out Jesse”
Pltf. 94				Highlighted Iteration of “Punching Out Jesse”
Pltf. 95				Iteration of “Punching Out Scruff Face”
Pltf. 96				Iteration of “Punching Out Scruff Face” with Comment
Pltf. 97				Iteration of “Punching Out Scruff Face”
Pltf. 98				Copy of Pages 310-312 of Book titled “American Sniper”
Pltf. 99				December 28, 2011 Email from Sharyn Rosenblum to Chris Kyle
Pltf. 100				Transcription titled “Opie & Anthony: American Sniper Chris Kyle”

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 101				January 4, 2012 Emails between Sharyn Rosenblum, Scott McEwen and Chris Kyle regarding more media links!
Pltf. 102				January 5, 2012 Emails between Sharyn Rosenblum, Peter Hubbard, Seale Ballenger and Lynn Grady regarding bn.com
Pltf. 103				Transcription of Interview by Bill O'Reilly of Chris Kyle, titled "Most Lethal Sniper in U.S. Military History"
Pltf. 104				January 6, 2012 Email from Michael Brennan to a number of people at HarperCollins regarding American Sniper
Pltf. 105				January 6, 2012 Emails between Douglas Menake, Michael Brennan, Lynn Grady, and others at HarperCollins regarding SNIPER is #22 on Amazon after Fox and Friends this AM
Pltf. 106				January 8, 2012 Email from James DeFelice to Chris Kyle regarding Brittney and Matthew from the LSF trip last year
Pltf. 107				January 9, 2012 Emails between Chris Kyle and Sharyn Rosenblum regarding "Jesse V," contacts for Bill O'Reilly
Pltf. 108				January 9, 2012 Emails between Chris Kyle and Sharyn Rosenblum regarding #1 bestselling book at Barnes and Noble
Pltf. 109				January 9, 2012 Emails between Chris Kyle, Sharyn Rosenblum, Peter Hubbard, James DeFelice and Scott McEwen regarding reprint schedule

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 110				January 9, 2012 Emails between Sharyn Rosenblum, Peter Hubbard, Chris Kyle, James DeFelice, and Scott McEwen regarding reprint schedule
Pltf. 111				January 9, 2012 Emails between Chris Kyle, Scott McEwen and Sharyn Rosenblum regarding reprint schedule
Pltf. 112				January 9, 2012 Emails between Sharyn Rosenblum and Scott McEwen regarding reprint schedule
Pltf. 113				Transcription of Opie and Anthony Interview of Chris Kyle with Alex Jones, titled “Radio Host Confronts SEAL Sniper Over Ventura Bar Brawl Story...and Reveals ‘Psy-Ops’ Theory”
Pltf. 114				January 10, 2012 Emails between Scott McEwen and Sharyn Rosenblum regarding Last night’s event
Pltf. 115				January 10, 2012 Emails between Sharyn Rosenblum and Peter Hubbard regarding Ventura
Pltf. 116				January 10, 2012 Emails between James DeFelice and Chris Kyle regarding Heard the O&A clips
Pltf. 117				January 11, 2012 Email from Sharyn Rosenblum to Scott McEwen and Peter Hubbard, forwarding emails between Sharyn Rosenblum and Dan Bank regarding Statement about Ventura/O'Reilly

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 118				January 11, 2012 Emails between James DeFelice, Sharyn Rosenblum, Scott McEwen and Chris Kyle regarding Statement about Ventura/O'Reilly
Pltf. 119				January 11, 2012 Emails between Chris Kyle, Peter Hubbard, Sharyn Rosenblum, Scott McEwen and James DeFelice regarding Statement about Ventura/O'Reilly
Pltf. 120				January 11, 2012 Emails between Scott McEwen and Peter Hubbard regarding BookScan rankings
Pltf. 121				January 11, 2012 Emails between Sharyn Rosenblum and Peter Hubbard regarding Chris's interviews
Pltf. 122				January 11, 2012 Emails between Sharyn Rosenblum and Peter Hubbard regarding O'Reilly
Pltf. 123				January 12, 2012 Email from Tavia Kowalchuk to Shawn Nicholls regarding Google ad words
Pltf. 124				January 12, 2012 Email from Sharyn Rosenblum regarding Morrow PR Flash, Big Clip & PR Flash for "American Sniper"
Pltf. 125				January 13, 2012 Emails between James DeFelice and Peter Hubbard regarding mention on O'Reilly
Pltf. 126				January 22, 2012 Print Hardcover, E-Book, and Combined Print & E-Book Best Sellers Lists

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 127				January 25, 2012 Email from Sharyn Rosenblum regarding Morrow PR Flash, Big Clip & PR Flash for "American Sniper"
Pltf. 128				"About Chris Kyle" page from Craft International web site
Pltf. 129				"CRAFT in the Media" page from Craft International web site
Pltf. 130				May 24, 2012 Article from The Hollywood Reporter titled "Bradley Cooper Sets Up Navy SEAL Pic 'American Sniper' at Warner Bros."
Pltf. 131				July 27, 2012 Email from Tom McGuire to Lauren Sudar, with attached Life Story & Exclusive Consulting Agreement labeled "WME Comments 7/27/12"
Pltf. 132				July 27, 2012 Email from Tom McGuire to Lauren Sudar regarding Chris Kyle/SNIPER
Pltf. 133				June 14, 2012 Life Story and Exclusive Consulting Agreement re: "American Sniper"
Pltf. 134				June 14, 2012 "American Sniper" Option Purchase Agreement between Warner Bros. and Chris Kyle
Pltf. 135				October 18, 2012 Check from Warner Bros. to Chris Kyle
Pltf. 136				October 1, 2012 Letter from WME to Chris Kyle and Scott McEwen
Pltf. 137				October 22, 2012 Letter from WME to Chris Kyle c/o Chris Kirkpatrick

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 138				October 3, 2012 WME Memo from Lizzie Thompson, Jay Mandel Assistant, to Linnette Shonert, cc: Jennifer Walsh Assistant
Pltf. 139				Operative Image Release and Agreement between Chris Kyle and Baba-G Productions
Pltf. 140				Copy of Cover Page and Selected Pages from Book titled "American Sniper"
Pltf. 141				Agreement to Prepare Manuscript between Chris Kyle, Scott McEwen, and Black Coyote Inc. Attn: Jim DeFelice (unsigned, with comments)
Pltf. 142				Image of Audio CD titled "Kyle on Ventura"
Pltf. 143				Image of Audio CD titled "Lacz on Ventura"
Pltf. 144				Reserved
Pltf. 145				January 9, 2012 Emails between Chris Kyle, Scott McEwen, Sharyn Rosenblum, Peter Hubbard, and James DeFelice regarding reprint schedule
Pltf. 146				January 10, 2012 Emails between James DeFelice, Chris Kyle, Sharyn Rosenblum, and Scott McEwen regarding Heard the O&A clips
Pltf. 147				Reserved
Pltf. 148				Reserved
Pltf. 149				Reserved

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 150A				Reserved
Pltf. 150B				May 22, 2012 Agreement between Chris Kyle and Scott McEwen
Pltf. 151A				Reserved
Pltf. 151B				“American Sniper” Copyright Assignment and Harper Collins Publishing Agreement
Pltf. 152A				Reserved
Pltf. 152B				June 14, 2012 “American Sniper” Option Purchase Agreement
Pltf. 153				September 27, 2012 Letter of Direction from Chris Kyle to WME, attn.: Tom McGuire
Pltf. 154				October 1, 2012 Letter from WME to Chris Kyle and Scott McEwen
Pltf. 155				May 9, 2011 Email from James DeFelice to Chris Kyle regarding media
Pltf. 156				January 3 and January 4, 2012 Emails between Sharyn Rosenblum, Scott McEwen, and Chris Kyle regarding more media links
Pltf. 157				January 9, 2012 Emails between Sharyn Rosenblum and Scott McEwen regarding reprint schedule
Pltf. 158				January 10, 2012 Emails between Scott McEwen, Sharyn Rosenblum, Peter Hubbard, and Chris Kyle regarding Last night’s event

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 159				January 11, 2012 Email from Sharyn Rosenblum to Scott McEwen and Peter Hubbard regarding Statement about Ventura/O'Reilly
Pltf. 160				January 11, 2012 Emails between Scott McEwen and Peter Hubbard regarding BookScan rankings
Pltf. 161				January 11, 2012 Emails between James DeFelice, Sharyn Rosenblum, Scott McEwen, Chris Kyle, and Peter Hubbard regarding Statement about Ventura/O'Reilly
Pltf. 162				January 11, 2012 Emails between Sharyn Rosenblum, Peter Hubbard, Scott McEwen, and Peter Hubbard regarding Chris's interviews
Pltf. 163				January 11, 2012 Emails between Sharyn Rosenblum, Peter Hubbard, Scott McEwen, Chris Kyle, and James DeFelice regarding O'Reilly
Pltf. 164				January 14, 2013 Letter from Silver & Silver APC to Court J. Anderson and John P. Borger
Pltf. 165				June 5, 2013 Transcript from "The O'Reilly Factor"
Pltf. 166				Certificate of Formation of CT Legacy, LLC
Pltf. 167				Pages from Chris Kyle Frog web site
Pltf. 168				Page from Facebook.com/ChrisKyleFrog advertising Taya Kyle Appearances at the Patriot Tour

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 169				Donation Page from Chris Kyle Memorial Trust web site
Pltf. 170				July 12, 2013 Article titled “Chris Kyle’s widow speaks about life without her husband, defamation suit”
Pltf. 171				Pages from Facebook.com/ChrisKyleFrog, printed August 19, 2013
Pltf. 172				Pages from Facebook.com/RIPChrisKyle, printed August 19, 2013
Pltf. 173				April 2013 D Magazine Article titled “The Legend of Chris Kyle”
Pltf. 174				June 3, 2013 Article titled “What Taya Kyle Told the <i>Dallas Morning News</i> About That Gas Station Incident”
Pltf. 175				February 8, 2013 D Magazine Article titled “Here’s What American Sniper Chris Kyle Said About His Killing Two Men at a Gas Station in 2009”
Pltf. 176				2006 Reunion Photograph
Pltf. 177				2006 Reunion Photograph
Pltf. 178				2006 Reunion Photograph
Pltf. 179				Objections and Responses to Plaintiff’s Interrogatories to Taya Kyle, Executor of the Estate of Chris Kyle, First Set
Pltf. 180				Reserved
Pltf. 181				“American Sniper” draft manuscript edits by James DeFelice (CK0000610-CK0000886)

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 182				“American Sniper” draft manuscript edits by James DeFelice (CK0000325-CK0000600)
Pltf. 183				“American Sniper” Option Purchase Agreement (WME Comments)
Pltf. 184				Various versions of and revisions to “Punching Out Scruff Face”
Pltf. 185				Cover Photo of Ventura on “The Blast” 3 rd Quarter 2000, Vol. 32, No. 3
Pltf. 186				July 22, 2013 Petition to Remove Ventura from UDT-SEAL Association Membership
Pltf. 187				Article titled “Did slain ‘American Sniper’ fatally shoot two armed robbers in 2009?”
Pltf. 188				February 8, 2013 D Magazine Article titled “Here’s What American Sniper Chris Kyle Said About His Killing Two Men at a Gas Station in 2009”
Pltf. 189				March 26, 2013 D Magazine Article titled “What Troubles Me About the Legend of Chris Kyle”
Pltf. 190				April 16, 2013 Article titled “Did Special Forces Snipers Kill Americans After Katrina?”
Pltf. 191				June 3, 2013 Article from The New Yorker titled “In the Crosshairs”
Pltf. 192				Chris Kyle Email Logo
Pltf. 193				April 12, 2013 Check from WME to CT Legacy LLC

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 194				HarperCollins Royalty Statement 00612499
Pltf. 195				April 1, 2013 Check from HarperCollins to WME
Pltf. 196				Listing of Bank Account Transactions
Pltf. 197				Supplemental Declaration of Kevin Lacz
Pltf. 198				Invitation to Ventura to speak at 2003 Reunion of Swift Boat Sailors Association
Pltf. 199				October 6, 2006 Bicentennial Class 258 BUDS Class 58 Reunion Schedule
Pltf. 200				July 28, 2010 Class 58 Agenda, Version 2
Pltf. 201				2006 Reunion Photograph
Pltf. 202				2006 Reunion Photograph
Pltf. 203				2006 Reunion Photograph
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Pltf. 290				2006 Reunion Photograph
Pltf. 291				2006 Reunion Photograph
Pltf. 292				2006 Reunion Photograph
Pltf. 293				2006 Reunion Photograph
Pltf. 294				January 12, 2012 Emails between Lynn Grady, Shawn Nicholls and Tavia Kowalchuk, regarding Google ad words
Pltf. 295				January 8, 2012 Email from Tavia Kowalchuk to Sharyn Rosenblum and Stephanie Kim regarding Morrow PR Flash, Big Clip & PR Flash for "American Sniper"
Pltf. 296				June 4, 2012 Email from Tavia Kowalchuk to Mary Ann Petyak and Peter Hubbard regarding Morrow PR Flash, Big Clip & PR Flash for "American Sniper"

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Pltf. 297				January 9, 2012 Email from Sharyn Rosenblum to Dan Bank and Andrew Paul regarding Chris Kyle
Pltf. 298				January 11, 2012 Email from Sharyn Rosenblum to Jason Rose regarding Chris Kyle's interview
Pltf. 299				January 9, 2012 Emails between Sharyn Rosenblum and Chris Kyle regarding "guys wanting to come out about Ventura"
Pltf. 300				January 13 through January 26, 2012 Emails between Sharyn Rosenblum and Jason Rose regarding American Sniper
Pltf. 301				January 9, 2012 Emails between Dan Bank, Sharyn Rosenblum and "John" ('jjkelly84@live.com') regarding Chris Kyle
Pltf. 302				January 10, 2012 Emails between Sharyn Rosenblum, Scott McEwen, Chris Kyle and James DeFelice regarding Heard the O&A clips
Pltf. 303				January 10, 2012 Emails between Sharyn Rosenblum and Chris Kyle regarding Jesse Ventura
Pltf. 304				January 9, 2012 Emails between Sharyn Rosenblum, Scott McEwen and Peter Hubbard regarding reprint schedule
Pltf. 305				January 11, 2012 Emails between Sharyn Rosenblum, Scott McEwen and Chris Kyle regarding Statement about Ventura/O'Reilly
Pltf. 306				January 11, 2012 Emails between Sharyn Rosenblum and Jon Ebinger regarding Opie & Anthony show, Ventura incident, Chris Kyle security issues
Pltf. 307				December 13, 2011 Email from Andrea Molitor to Kim Lewis and Peter Hubbard regarding American Sniper changes, with attachments

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 308				January 9, 2012 Emails between Sharyn Rosenblum and Scott McEwen regarding reprint schedule
Pltf. 309				January 9, 2012 Emails between Scott McEwen, Chris Kyle, Peter Hubbard, and Sharyn Rosenblum regarding reprint schedule
Pltf. 310				January 9, 2012 Emails between Chris Kyle and Sharyn Rosenblum regarding calls coming in to confirm Kyle's story
Pltf. 311				January 9, 2012 Emails between Chris Kyle and Sharyn Rosenblum regarding call about "Jesse V. stuff"
Pltf. 312				January 9, 2012 Emails between Chris Kyle and Sharyn Rosenblum regarding "Jesse V.," #1 bestselling book at Barnes and Noble
Pltf. 313				January 22, 2012 New York Times Print Hardcover Best Seller List
Pltf. 314				Iteration of "Punching out Scruff Face," with comments
Pltf. 315				January 6, 2012 Emails between Peter Hubbard, Liate Stehlik, and Lynn Grady regarding American Sniper – reprint/reorder update
Pltf. 316				January 4, 2012 Emails between Sharyn Rosenblum and Lynn Grady regarding O'Reilly/American Sniper
Pltf. 317				Excerpt from "American Sniper"
Pltf. 318				HarperCollins Insurance Policy through Mutual Insurance Company Limited
Pltf. 319				Photograph of DeShazo Sisters and Friend with Ventura
Pltf. 320				Handwritten Notes of James DeFelice
Pltf. 321				Various redacted emails dated January 9 through January 11, 2012
Pltf. 322				October 2006 Ventura Car Rental Records from National Car Rental System

Exh. No.	Date Offered	Marked	Admitted	Description
Pltf. 323				October 18, 2012 Department of the Navy Response to FOIA Request 13-001N
Pltf. 324				August 6, 2012 Emails between Scott McEwen and Tom McGuire regarding Chris Kyle/SNIPER and correspondence with Warner Bros. lawyer, Lauren Sudar
Pltf. 325				January 9, 2012 Emails between Sharyn Rosenblum, Peter Hubbard, Chris Kyle, James DeFelice and Scott McEwen regarding reprint schedule
Pltf. 326				June 1 through June 4, 2012 Emails between Anat Hovav, Chris Kyle and Chris Kirkpatrick regarding "Stars Earn Stripes" and Ventura lawsuit
Pltf. 327				March 14, 2011 through January 8, 2012 Emails regarding Brittney and Matthew from the LSF trip last year
Pltf. 328				Handwritten Notes of James DeFelice
Pltf. 329				Separation Document from US Navy – James George Janos
Pltf. 330				Video: April 6, 2013 WFAA Interview - Widow Says Gun Class for Teachers Fulfills Chris Kyle's Dream
Pltf. 331				Video: May 23, 2013 The Right Scoop - Taya Kyle's NRA-ILA Leadership Forum Speech
Pltf. 332				Video: May 6, 2013 FrontBurner D Magazine - SEAL Chris Kyle's wife Taya Emotional Speech at NRA-ILA Leadership Forum
Pltf. 333				Video: May 13, 2013 Outdoor Channel - Taya Kyle talks about Chris Kyle's American Gun
Pltf. 334				Video: June 2, 2013 Today Show Interview - Widow of murdered SEAL sniper 'I was always in fear for his life'
Pltf. 335				Video: June 5, 2013 The O'Reilly Factor - Taya Kyle in the No Spin Zone

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Pltf. 336				Video: June 5, 2013 WilliamMorrow - Taya Kyle on the book AMERICAN GUN by Chris Kyle (author of American Sniper)
Pltf. 337				Video: June 6, 2013 Glenn Beck - Wife of Murdered SEAL Hero Tells Glenn PTSD is Not to Blame
Pltf. 338				Video: June 13, 2013 MSNBC The Cycle Interview - Success is Bittersweet for Slain Soldier's New Book
Pltf. 339				Video: June 13, 2013 NBC News - Taya Kyle as a Gun Rights Advocate
Pltf. 340				Audio Recording: June 16, 2013 NPR Interview - A Posthumous Tribute to Guns from a Sniper Shot to Death
Pltf. 341				Video: June 24, 2013 CBS Dallas Fort Worth - Chris Kyle's Widow Says PTSD No Excuse For Murder
Pltf. 342				Video: July 12, 2013 WFAA Good Morning Texas - Chris Kyle's Widow, Taya, on Finishing his Book, 'American Gun'
Pltf. 343				Video: July 12, 2013 WFAA Interview - Chris Kyle's Widow Speaks About Life Without Her Husband, Defamation Suit
Pltf. 344				Video: July 13, 2013 Mike Gallagher Show - Mike Scinto Live Mike Scinto with Taya Kyle
Pltf. 345				Video: July 18, 2013 NRA News Cam & Co Interview - American Gun A History of the US in Ten Firearms by Chris Kyle
Pltf. 346				Video: July 31, 2013 Wilkow! - Taya Kyle finishes husband's book American Gun
Pltf. 347				Video: August 7, 2013 Smack Talk Radio - Marty Logan and Taya Kyle discussing Chris Kyle 2013 Tribute tour
Pltf. 348				Video: Chris Kyle on O'Reilly Factor
Pltf. 349				Video: Fox News - The Five

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Pltf. 350				Video: Navy Seal Chris Kyle, In Studio with Opie & Anthony
Pltf. 351				Video: January 4, 2012 Opie & Anthony - American Sniper Chris Kyle

HENSON & EFRON, P.A.

Dated: April 21, 2014

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